

EXHIBIT 13

From: [Stephen Stern](#)
To: [Gregory Jordan](#); [Thomas J. Gagliardo](#)
Cc: [Heather Yeung](#)
Subject: RE: Boshea v. Compass Marketing, Inc. - Rebuttal Expert
Date: Monday, September 27, 2021 5:32:00 PM
Attachments: [image001.png](#)

Greg:

You still did not state when we will be getting this document production that is long overdue. Also, while you reference emails, you did not mention anything about text messages. We need the complete document production – emails, text messages, and any other documents.

Stephen



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From: Gregory Jordan <gjordan@jz-llc.com>
Sent: Monday, September 27, 2021 5:27 PM
To: Stephen Stern <Stern@kaganstern.com>; Thomas J. Gagliardo <tgagliardo@gelawyer.com>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: Boshea v. Compass Marketing, Inc. - Rebuttal Expert

I would like 14 days from your production date to give our expert time. Let me know.

I received David's email through my IT guy this afternoon. I have review for attorney-client items since it was based on a boolean search. Certain emails have nothing to do with either of the White brothers.

I received an email from Dan White that John White sent him on blind copied him on May 22, 2007. David's agreement is attached to the email. I will forward separately.

Greg

Gregory J. Jordan

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Jordan & Zito LLC

From: Stephen Stern <Stern@kaganstern.com>
Sent: Monday, September 27, 2021 3:47 PM
To: Gregory Jordan <gjordan@jz-llc.com>; Thomas J. Gagliardo <tgagliardo@gelawyer.com>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: Boshea v. Compass Marketing, Inc. - Rebuttal Expert

Greg:

I received your voice message about your rebuttal expert designation. I know we owe you the documents you requested. We are hoping to produce them later today or tomorrow. If you want an extension for a rebuttal expert designation, that is perfectly fine. It is reasonable and appropriate to request one with us still needing to get you the documents. Please let me know how much time you would like and I am sure we can work that out.

Stephen

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